

## **TITLE 326 AIR POLLUTION CONTROL BOARD**

### **DEVELOPMENT OF AMENDMENTS TO RULES CONCERNING SULFUR DIOXIDE (SO<sub>2</sub>) AND PARTICULATE MATTER (PM<sub>10</sub>) EMISSIONS AT THE D.H. MITCHELL GENERATING STATION IN LAKE COUNTY #97-5(APCB)**

#### **SUMMARY/RESPONSE TO COMMENTS FROM THE SECOND COMMENT PERIOD**

The Indiana Department of Environmental Management (IDEM) requested public comment from October 1, 1997 through October 31, 1997 on IDEM's draft rule language. IDEM received comments from the following parties:

Northern Indiana Public Service Company (NIPSCo)

Following is a summary of the comments received and IDEM's responses thereto.

*Comment:* The "Subject Matter and Basic Purpose of Rulemaking" section incorrectly lists item number two (2) as a change in operation when in fact it is an operating mode currently allowed by the existing SIP requirements. We recommend that this item be deleted. (NIPSCo)

*Response:* IDEM has noted this discrepancy and will remove it in future rulemaking descriptions.

*Comment:* The draft rule language in 326 IAC 6-1-10.1(d)(33)(A)(i) as well as 326 IAC 7-4-1.1(c)(17)(B)(i) is worded such that it requires the nozzle restricting the diameter to eight and three-tenths (8.3) feet on the stacks serving boiler numbers 4 and 5 as well as boiler numbers 6 and 11 be installed and remain in place even if the scenario of operating all four boilers simultaneously on coal is no longer used. We do not believe that this restriction is appropriate and wish to be able to have the ability to operate under the current SIP limitations without the requirement for the nozzle, as is currently allowed. Suggested draft rule language was provided. (NIPSCo)

*Response:* The draft rule requires that the nozzle restricting the exit diameter of the stack to eight and three-tenths (8.3) feet be in place in order to operate under the operating scenarios at 326 IAC 6-1-10.1(d)(33)(A)(ii)(CC), (DD), and 326 IAC 7-4-1.1(c)(17)(B)(ii)(CC), (DD) of boiler numbers 4, 5, 6, and 11 operating simultaneously on coal or the scenario of one set of boiler numbers 4 and 5 or 6 and 11 operating on coal while the other set is not operating. The rule language will be clarified per suggested language to reflect this requirement.

*Comment:* For the phrase "Specified emission limits shall be maintained during transition period between operating scenarios", we recommend the phrase "within or" be inserted after "transition period" and "period" be changed to "periods" at 326 IAC 6-1-10.1(d)(33)(A)(ii), 326

IAC 6-1-10.1(d)(33)(A)(iii)(BB), 326 IAC 7-4-1.1(c)(17)(B)(ii), and 326 IAC 7-4-1.1(c)(17)(B)(iii)(BB). These changes would help clarify the requirement to be met during periods of transition which can also occur within operating scenarios. Suggested draft rule language was provided. (NIPSCo)

*Response:* IDEM agrees that the suggested language clarifies the types of operational transitions between and within operating scenarios and will make the changes accordingly.

*Comment:* The existing SIP language describing emission limitations for the stack serving boiler numbers 6 and 11 is deleted in the draft rule language at 326 IAC 6-1-10.1(d)(33)(A)(ii)(BB). While the purpose of the SIP change is to provide additional operating modes, we believe the existing limit should be stated to better reflect all the possible operating scenarios. Suggested draft rule language was provided. (NIPSCo)

*Response:* IDEM agrees. The existing emission limit was inadvertently absent in the draft rule language. The existing emission limit for boiler numbers 6 and 11 will be stated per suggested language to better reflect all possible operating scenarios.

*Comment:* The term “on coal” needs to be added, to specify fuel use in the different operating scenarios, in the following sections: 326 IAC 6-1-10.1(d)(33)(A)(ii)(CC), 326 IAC 6-1-10.1(d)(33)(A)(ii)(DD), 326 IAC 7-4-1.1(c)(17)(B)(ii)(CC), and 326 IAC 7-4-1.1(c)(17)(B)(ii)(DD). Suggested draft rule language was provided. (NIPSCo)

*Response:* IDEM agrees and will specify “on coal” were applicable to specify fuel used in various operating scenarios.

*Comment:* At 326 IAC 6-1-10.1(d)(33)(A)(iii)(CC) the term “Operational status” for the daily log entry is vague and unclear. We are presuming that IDEM is seeking information about which operating scenario the boiler is operating under, not whether or not the boiler is operating. (NIPSCo)

*Response:* IDEM agrees that the term is unclear. Information related to operating scenario being used is accounted for in record-keeping already. The “Operational status” requirement for the daily log will be removed.

*Comment:* The proposed rule language at 326 IAC 6-1-10.1(d)(33)(B) imposes an undue burden on us to meet the lower emission limits that are only appropriate in demonstrating compliance with the operating scenario of all four (4) boilers operating on coal simultaneously. We recommend that IDEM add language that does not require meeting the more stringent emission limit if the alternate operating scenario will not be utilized in the future. We believe that it is the intent of IDEM to specify the stack testing of the boilers to verify that emission limits are being met under the various operating scenarios, including the alternate operating scenario that allows all four (4) boilers to operate simultaneously on coal. Suggested draft rule language was provided. (NIPSCo)

*Response:* It is necessary that compliance with an emission limit of 0.074 pound per million Btu be demonstrated within sixty (60) days of initial operation under 326 IAC 6-1-10.1(d)(33)(A)(ii)(CC). After the initial demonstration, it is necessary that biennial stack testing

demonstrate compliance with the worst case operating scenario used since the previous stack test. If in this time period the operating scenario of boiler numbers 4, 5, 6, and 11 operating simultaneously on coal has not been used or can no longer be used, it is not necessary to demonstrate compliance with the corresponding emission limit. By default, it would be necessary to demonstrate compliance with the worst case operating scenario allowed by the SIP with an emission limit of 0.100 pound per million Btu. IDEM agrees with the nature of NIPSCo's comment and will use suggestions in structuring rule language to meet these requirements.

*Comment:* Throughout all of Article 7, the SO<sub>2</sub> limits for combustion sources are expressed in pounds per million Btu, therefore we question the need and appropriateness of the proposed rule language having both a pound per million Btu (lb/mmBtu) and pound per hour (lb/hr) emission limit. Furthermore, the reporting requirements call for the daily weighted average in pounds per million Btu. Therefore, we recommend deleting the limits expressed in pounds per hour (lb/hr) throughout 326 IAC 7-4-1.1(c)(17)(B)(ii). (NIPSCo)

*Response:* A pound per hour emission limit is necessary to ensure that the hourly National Ambient Air Quality Standards (NAAQS) will not be exceeded and is useful in ensuring compliance with modeled emission limits. While emission limits expressed in pounds per hour were not previously used extensively in Article 7, such limits are being incorporated, where appropriate, in various SIP changes.

*Comment:* At 326 IAC 7-4-1.1(c)(17)(B)(ii)(BB), the proposed language is focused on the operating mode currently in the approved SIP for boiler numbers 4 and 5, but does not mention or continue to allow for the operation of boiler numbers 6 and 11 of the current SIP approved operating mode and limits. The existing SIP language describing the limitations on the stack serving boiler numbers 6 and 11 was deleted from the draft rule language. Suggested draft rule language was provided. (NIPSCo)

*Response:* IDEM agrees. The existing emission limit for boiler numbers 6 and 11 was inadvertently absent in the draft rule language. The existing emission limit for boiler numbers 6 and 11 will be included per suggested language to better reflect all possible operating scenarios.

*Comment:* At 326 IAC 7-4-1.1(c)(17)(D) the regulatory citation of 326 IAC 3-1.1-3(a) needs to be checked for consistency with the recent IDEM revisions to the monitoring rules. (NIPSCo)

*Response:* The citation listed in the draft rule language for the continuous emissions monitoring requirements has been repealed and has been replaced with the citation for the current requirement for continuous emission monitoring at 326 IAC 3-5.

*Comment:* The language deleted at 326 IAC 7-4-1.1(c)(17)(D) addressing the current SIP requirements for maintaining and making available to IDEM records of the daily average emission data, and the language added to this section requiring maintenance of three (3) hour block average emissions data are inappropriate and inconsistent with the current SIP limits. The following language is suggested: "Records of daily average emissions data shall be maintained for a minimum of five (5) years and shall be made available to the department and U.S.EPA upon request. (NIPSCo)

*Response:* Because continuous emissions data is recorded and then can be manipulated to show a variety of output, for example daily weighted average, hourly, and three (3) hour block average emissions data, it is only necessary to require daily average emissions data to demonstrate compliance . Three (3) hour block emissions data can be derived from raw data to demonstrate compliance with the three (3) hour SO<sub>2</sub> air quality standards if necessary. IDEM agrees with suggested draft language and will make appropriate changes.